

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|                          |   |                            |
|--------------------------|---|----------------------------|
| UNITED STATES OF AMERICA | : | CRIM. NO. 3:CR-14-         |
|                          | : |                            |
| v.                       | : | (Judge                   ) |
|                          | : |                            |
| SANDRA JALOWIEC,         | : |                            |
| Defendant                | : | (Electronically Filed)     |

**INFORMATION**

**Count One**  
**18 United States Code, §1347(a)(2)**  
**(Health Care Fraud)**

**THE UNITED STATES ATTORNEY CHARGES:**

**INTRODUCTION**

1. The defendant, Sandra Jalowiec, is an adult individual employed as a medical assistant/technician at the medical offices of Dr. Michael Jalowiec, 821 South Main Street, Old Forge, Pennsylvania.

2. Blue Cross of Northeastern Pennsylvania (BCNEPA) is a “health care benefit program” that offers health care coverage options, including prescription plans, for members throughout Northeastern Pennsylvania and surrounding areas. BCNEPA has multiple offices

located within the Middle District of Pennsylvania, including Wilkes-Barre, Pennsylvania.

3. BCNEPA is a health care benefit program as defined in Title 18, United States Code, Section 24(b), in that it is any public or private plan or contract, affecting commerce, under which any medical benefit, item, or service is provided to any individual, and includes any individual or entity who is providing a medical benefit, item, or service for which payment may be made under the plan or contract.

4. At all times material to this information, BCNEPA received, processed, and paid insurance claims submitted to BCNEPA by suppliers of services.

5. At all times material to this information, the defendant was a customer who participated in a BCNEPA health care benefit program. The defendant submitted or caused to be submitted insurance claims to BCNEPA for payment of services rendered and alleged services rendered.

#### **Scheme to Defraud**

6. From on or about January 2008 through May 2014, in the

Middle District of Pennsylvania and elsewhere, the defendant, Sandra Jalowiec, devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, well knowing at the time that such pretenses, representations and promises were false and fraudulent when made.

7. The purpose and object of the scheme and artifice was to obtain money fraudulently from funds provided under a BCNEPA health care benefit program.

8. It was part of the scheme and artifice to defraud that the defendant forged prescriptions for various narcotics using the name of a licensed medical doctor in order to obtain a continuous flow of pain medications.

9. It was part of the scheme and artifice to defraud that the defendant submitted or caused to be submitted fraudulent claims to BCNEPA seeking payment for drugs allegedly prescribed to her when, in fact, those prescriptions were forged by her and fraudulent.

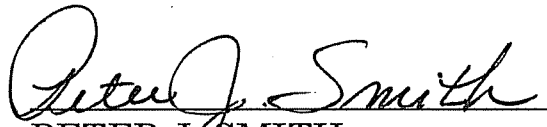
10. On or about January 2008 through May 2014, in the Middle

District of Pennsylvania and elsewhere, the defendant,

SANDRA JALOWIEC

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud, by means of materially false and fraudulent pretenses, representations, and promises, to obtain money and property owned by and under the custody and control of Blue Cross of Northeastern Pennsylvania, a health care benefit program as defined in Title 18, United States Code, Section 24(b), in connection with the payment and delivery of health care benefits, items, and services, in violation of Title 18, United States Code, Section 1347(a)(2).

7/29/14  
Date

  
PETER J. SMITH  
United States Attorney